

HOGAN & HARTSON
L.L.P.

LINDA L. OLIVER
PARTNER
DIRECT DIAL (202) 637-6527

April 3, 2000

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

BY HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RECEIVED
APR 3 2000
FEDERAL COMMUNICATIONS COMMISSION

**Re: Access Charge Reform, CC Docket No. 96-262
Price Cap Performance Review for Local Exchange
Carriers, CC Docket No. 94-1
Low Volume Long Distance Users, CC Docket No. 99-249
Federal-State Joint Board on Universal Service,
CC Docket No. 96-45**

Dear Ms. Salas:

Pursuant to the FCC's Public Notice DA 00-533, released March 8, 2000, and as amended by Public Notice DA 00-692, released March 24, 2000, enclosed for filing in the above-referenced dockets, CC No. 96-262, et al., are the original and four copies of the "Comments of Qwest Communications Corp." Also enclosed are two additional copies for inclusion in each of the other dockets. Three copies of the comments have been forwarded to Wanda Harris of the Competitive Pricing Division and a diskette containing the comments has been forwarded to ITS.

Please contact the undersigned if you have any questions.

Respectfully submitted,

Linda L. Oliver

Linda L. Oliver
Counsel for Qwest Communications Corp.

Enclosures

cc: Wanda Harris, Competitive Pricing Division
ITS

No. of Copies rec'd
List ABCDE

07 10

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review for Local Exchange Carriers)	CC Docket No. 94-1
)	
Low Volume Long Distance Users)	CC Docket No. 99-249
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45

RECEIVED
FEB 3 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**SUPPLEMENTAL COMMENTS OF
QWEST COMMUNICATIONS CORPORATION**

Qwest Communications Corp. ("Qwest"), through its attorneys, hereby respectfully submits supplemental comments in support of the July 29, 1999, proposal of the Coalition for Affordable Local and Long Distance Service (CALLS) for universal service and interstate access reform, as revised in the CALLS March 8, 2000 ex parte filing.^{1/}

As a provider of both interexchange and local services, and of both voice and data services, Qwest has a strong interest in the size and structure of interstate access charges and the manner in which universal service subsidies are

^{1/} See Public Notice DA00-533 (released March 8, 2000) (seeking supplemental comment on revised CALLS plan and AT&T and Sprint ex partes); Public Notice DA 00-692 (released March 24, 2000) (extending time for filing of supplemental comments); *Notice of Proposed Rulemaking*, FCC 99-235, released September 15, 1999 (seeking comment on original CALLS proposal).

collected and distributed. ^{2/} Qwest supported the original CALLS plan in its November 12, 1999, comments because the plan moves in the direction of rationalizing the current access charge scheme, by moving non-usage based costs to flat-rated end user charges. As Qwest observed, the CALLS proposal would create a cost structure that is more compatible with a competitive long distance marketplace, with a developing competitive local marketplace, and with future RBOC entry into the interLATA business.

In its comments, Qwest noted that the plan helps achieve the following important public policy goals:

- ✓ It moves more of the non-traffic-sensitive costs from usage-based access charges to flat-rated end user charges, thereby sending the proper economic signals to consumers and to competitors.
- ✓ It moves carrier access charges in the direction of cost.
- ✓ It makes more of the subsidies for universal service explicit. ^{3/}

^{2/} Qwest is a communications company offering a full range of voice, data, video and information services both domestically and internationally. Qwest has completed the construction of an 18,500-mile, 150-city domestic fiber optic network that offers customers and carriers the ability to transmit massive amounts of communications information throughout the United States, and has international facilities to Mexico, Europe, and Asia. Qwest also has announced a 25-city deployment of local telephone facilities and a planned roll-out of commercial DSL-based services in over 40 cities.

^{3/} The CALLS proposal does not attempt to deal with the question of the extent to which amounts recovered through access charges represent legitimate subsidy payments.

The revised plan remains the result of compromise, and therefore is not perfect. However, it continues to advance its original public policy goals, and as revised remains in the public interest. The revisions to the plan appear to be directed primarily toward reducing potential adverse impacts on consumers (and in particular, adverse impacts on low-volume residential users of long distance services). Even as revised, however, the plan continues to provide the Commission with a platform for moving the access charge scheme to a better structure, one that is essential to the development of competitive local markets and the preservation of a competitive long distance market.

For these reasons, Qwest continues to support the CALLS plan, as revised, and urges the Commission to adopt it.

Respectfully submitted,



R. Steven Davis
Senior Vice President, Government Affairs
Senior Associate General Counsel
Qwest Communications Corporation
555 Seventeenth Street
Denver, Colorado 80202
Phone: (303) 992-4200
Fax: (303) 992-1044

Linda L. Oliver
Hogan & Hartson L.L.P.
555 13th St., N.W.
Washington, D.C. 20004
Phone: (202) 637-5600
Fax: (202) 637-5910
Counsel for Qwest
Communications Corporation

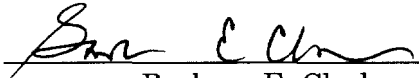
April 3, 2000

CERTIFICATE OF SERVICE

I, Barbara E. Clocker, hereby certify that on this 3rd day of April, 2000,
copies of the foregoing "Supplemental Comments of Qwest Communications Corporation"
were served by hand delivery to the following:

Wanda Harris
Competitive Pricing Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW, Room 5-A322
Washington, DC 20554

ITS
1231 20th Street
Washington, DC 20554


Barbara E. Clocker